

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

EMORY STEVE BROWN,

Plaintiff,

v.

CLAIMS MANAGEMENT, INC.,

Defendant.

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**CASE NUMBER:
3:05-CV-00681-WKW**

**CERTIFICATE OF NEED TO FILE DISCOVERY/
NOTICE OF FILING DEPOSITION TRANSCRIPTS IN
SUPPORT OF CLAIMS MANAGEMENT, INC.'S
MOTION FOR SUMMARY JUDGMENT**

COMES NOW the defendant, Claims Management, Inc., and gives notice that it is filing with the Court the following documents: (1) the original transcript of the deposition of Emory Steve Brown; (2) a copy of the transcript of the deposition of Victoria Heppes; and (3) the original transcript of the deposition of Amy C. Miller. As required by Local Rule 5.1, undersigned counsel certifies that these deposition transcripts are being used in the proceedings as part of the defendant Claims Management, Inc.'s Motion for Summary Judgment.

Counsel for defendant Claims Management originally attempted to file the above-referenced depositions on August 21, 2006, but the files were rejected by the Court's electronic filing system due to their size. The depositions have been subdivided into

smaller units and scanned in a .pdf format, and are now resubmitted herewith for the Court's consideration.

This 22nd day of August, 2006.

Respectfully submitted,

CARLCOK, COPELAND, SEMLER
& STAIR, LLP

BY: /s/ Archie I. Grubb, II
Archie I. Grubb, II
Attorney Code: GRU015
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Management, Inc.
Post Office Box 139
Columbus, GA 31902-0139
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CERTIFICATE OF SERVICE

I, Archie I. Grubb, II, do hereby certify that I am counsel for defendant Claims Management, Inc., and that I have served a copy of the above and foregoing CERTIFICATE OF NEED TO FILE DISCOVERY/ NOTICE OF FILING OF DEPOSITION TRANSCRIPTS IN SUPPORT OF THE DEFENDANT CLAIMS MANAGEMENT, INC.'S MOTION FOR SUMMARY JUDGMENT upon all counsel of record, via electronic filing and by depositing a true copy of same in the United States mail, postage prepaid, in an envelope addressed to opposing counsel as follows:

John A. Tinney, Esquire
Post Office Box 1430
Roanoke, Alabama 36274

This 22nd day of August, 2006.

/ Archie I. Grubb, II
Of Counsel for the Defendant